

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

Case No. HG 08-10454

MARIA E. PALOMARES,

Chapter 7; Filed: 11/21/08

Debtor.

Honorable Jeffrey R. Hughes

/

MOTION TO COMPEL TURNOVER

NOW COMES Chapter 7 Trustee Jeff A. Moyer (“Trustee”), by and through his attorneys, The Bankruptcy Group, Inc., and states as his Motion to Compel Turnover to the Court the following:

1. On November 21, 2008, Maria E. Palomares (“Debtor” or “Palomares”) filed a voluntary Chapter 7 petition for relief under the Bankruptcy Code.
2. Jeff A. Moyer (“Trustee” or “Movant”) is the duly-appointed, qualified and acting Chapter 7 Trustee in this case.
3. The Trustee requests turnover from Ms. Palomares the amount of \$7,594.03 representing her undisclosed, non-exempt 2008 IRS and State tax refunds. The Trustee requests turnover of those funds for the benefit of her bankruptcy creditors.
4. The personal property involved is not of inconsequential value nor without benefit to the estate.
5. Ms. Palomares is required to turnover the funds in question to the Trustee and has not yet done so.

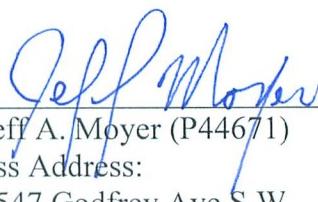
WHEREFORE, Trustee Jeff A. Moyer requests this Court to enter an Order granting the following relief:

- A. Requiring the immediate turnover by Ms. Palomares the amount of \$7,594.03 representing her undisclosed, non-exempt 2008 IRS and State tax refunds; and
- B. Grant such other or further relief as this Court deems just and proper.

Respectfully submitted,

THE BANKRUPTCY GROUP, INC.
Attorneys for Trustee Jeff A. Moyer

Dated: September 30, 2011

By: 
Jeff A. Moyer (P44671)
Business Address:
1547 Godfrey Ave S.W.
Wyoming, MI 49509
(616) 724-1890